

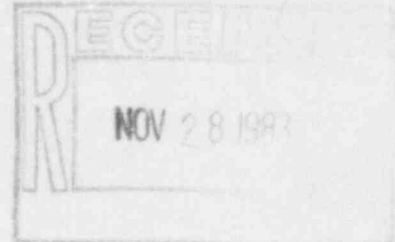


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

November 25, 1983

Mr. J. E. Gagliardo, Acting Chief
Reactor Projects Branch 2
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 83-156

Re: Docket No. STN 50-482

Subj: Response to Inspection Report STN 50-482/83-30

Dear Mr. Gagliardo:

This letter is written in response to your letter of October 28, 1983, which transmitted Inspection Report STN 50-482/83-30. As requested, the violations identified in the Inspection Report are being addressed in three parts:

- a) The corrective steps which have been taken and the results achieved;
- b) Corrective steps which will be taken to avoid further violations; and
- c) The date when full compliance will be achieved.

Violation 8330-01: Failure to Provide Adequate Procedures

Finding:

10 CFR Part 50, Appendix B, Criterion V, requires, in part, that activities affecting quality be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances. ANSI 18.7 states that procedures shall be provided for chemical control activities and should include the nature and frequency of sampling and analysis; instructions for maintaining coolant quality within prescribed limits; and limitations on concentrations of agents that could cause corrosive attack, foul heat transfer surfaces or become sources of radiation hazards due to activation.

Contrary to the above, the Kansas Gas and Electric Company (KG&E) Administrative Procedure, ADM 04-006, Revision 1, "Chemistry Monitor Program (Non-Technical Specification Items)", is inadequate for the control of steam generator secondary side chemistry in that it fails to specify sampling nature and frequency, limitations on concentrations and instructions for maintaining coolant quality.

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Response:

a) Corrective steps which have been taken and results achieved:

The procedure "Chemistry Surveillance Program", ADM 04-020, has been revised. It is an all encompassing procedure identifying system, mode of operation on these systems and the chemical analysis required on those systems under those modes of operation. This procedure will replace ADM 04-006, Revision 1, "Chemistry Monitor Program" which has been identified as inadequate.

To address the limits which the analysis must meet, the "WCGS Chemistry Specification Manual" has been prepared. This manual describes the limits set on corrosive agent levels for all plant systems requiring chemical analysis. Specifically addressing proper chemistry control of the steam generators' secondary side, procedure ADM 04-007, "Secondary Chemistry Control" has been prepared. This procedure describes the three principal modes of operation for the steam generators, wet layup, hot standby and normal operation, and the instructions for maintaining secondary coolant quality.

These documents are currently undergoing final review by the Plant Safety Review Committee (PSRC) and will be scheduled for approval at the next PSRC Meeting.

In addition, a formal analysis schedule has been prepared under the signature of the Site Chemist and issued pursuant to ADM 04-006, Revision 1, which contains sampling nature and frequency, and limitations on concentrations, for use until the above procedure revisions are issued.

b) Corrective steps which will be taken to avoid further violation:

The "Chemistry Surveillance Program" and the "WCGS Chemistry Specification Manual" have been prepared as all encompassing documents as discussed above. Thus, adequate procedural control of chemistry for subsequent systems is provided.

c) Date when full compliance will be achieved:

Full compliance will be achieved by December 9, 1983.

Violation 8330-02: Failure to Provide Adequate Procedures

Finding:

10 CFR Part 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances.

Contrary to the above, the Daniel International Corporation (DIC) Administrative Procedure, AP-XIII-05, Revision 5, "Project Housekeeping" and KQIE Administrative Procedure, ADM-01-034, Revision 2, "Housekeeping and Cleanliness

Control", do not meet the guidelines of Regulatory Guide 1.39 and ANSI 45.2.3. Furthermore, they do not adequately control the activities of all the various work groups performing work in clean zones.

Response:

a) Corrective steps which have been taken and results achieved:

Operations Administrative Procedure ADM 01-034, "Housekeeping and Cleanliness Control" has been thoroughly reviewed against the requirements of ANSI 45.2.3 and a proposed revision submitted to provide compliance with the requirements of ANSI 45.2.3 and to include the Startup organization which is conducting its activities in accordance with ADM 01-034. This revision to the procedure is presently in the review process and is scheduled for approval at the next Plant Safety Review Committee Meeting.

A list of areas presently under Startup and Operations jurisdiction has been developed and appropriate cleanliness levels assigned by the Plant Manager. The areas have been posted to indicate the assigned cleanliness level and management personnel have been instructed to ensure their personnel are aware of the cleanliness level assignments.

Currently there are no areas classified as Zone I, II or III which are under the jurisdiction of the Constructor.

b) Corrective steps which will be taken to avoid further violation:

The Constructor's Administrative Procedure AP-XIII-05 will be revised to specifically require the Construction Manager to review all areas for proper zoning on a quarterly basis. Zone changes shall also be made at more frequent intervals when deemed necessary due to construction progress. AP-XIII-05 will also be revised to require a Quality inspector to complete tool, material, equipment and personal property written records prior to personnel entering and exiting Zone I, II and III areas under the Constructor's jurisdiction. Personnel accountability will also be maintained by the KG&E Security Guard posted at the area.

When area jurisdiction is transferred to KG&E Operations or Startup, a memorandum designating the cleanliness zone will be issued by the Plant Manager, or his designee, and appropriate control measures for the cleanliness level will be implemented.

For any areas designated as Zones I, II or III, an individual will be assigned the responsibility for access control of personnel and materials. Annually, prior to major outages, or when other conditions may warrant, area zone classifications will be reviewed by the Plant Manager, or his designee, and areas reclassified if required.

This violation will be discussed with Plant Management.

Mr. J. E. Gagliardo
KMLNRC 83-156

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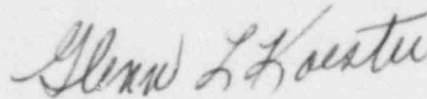
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c) Date when full compliance will be achieved:

Full compliance will be achieved by January 25, 1984.

Supporting documentation for the responses provided above is available for review at the Wolf Creek job site. If you have any further questions concerning this response, please contact me or Mr. Otto Maynard of my staff.

Very truly yours,



Glenn L. Koester
Vice President - Nuclear

GLK:cks

cc: RCDeYoung
WSchum/ASmith